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21 IN THE UNITED STATES DISTRICT COURT  
22 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
23 SAN FRANCISCO DIVISION

24 COLLATERAL ANALYTICS, LLC,  
25 v.  
26 NATIONSTAR MORTGAGE LLC,  
27 XOME SETTLEMENT SERVICES LLC, and  
28 QUANTARIUM, LLC,  
Defendants.

Case No. 3:18-cv-00019-RS

**THE PARTIES' STIPULATION AND  
[PROPOSED] ORDER REGARDING  
DISCOVERY OF EMAILS AND  
ATTACHMENTS**

Ctrm: 3, 17th Floor  
Judge: Honorable Richard Seeborg

1 Pursuant to the Court's minute order following the initial case management conference held in  
2 this case on April 19, 2018, ECF No. 53, Plaintiff Collateral Analytics, LLC and Defendants Nationstar  
3 Mortgage LLC, Xome Settlement Services, LLC, and Quantarium, LLC (together, the "Parties") held a  
4 further meet and confer regarding discovery of emails and their attachments. The Parties respectfully  
5 submit the following protocol to limit the discovery of emails and their attachments in this case:

6 1. Within twenty-one (21) days from the service of a request for production ("RFP") for  
7 emails and their attachments, the Parties shall meet and confer to develop a list of custodians and search  
8 terms that the Responding Party will use to search for, review, and produce any emails and attachments  
9 responsive to the RFP.

10 2. At least seven (7) days before the meet and confer the Propounding Party shall serve a  
11 proposed list of custodians and search terms for each of the Propounding Party's RFPs that requests  
12 emails and their attachments.

13 3. At the meet and confer, the Responding Party shall be prepared to discuss the number of  
14 emails that contain each of the search terms by custodian (*i.e.*, the hit counts) identified in the  
15 Propounding Party's proposed list. The Parties agree to negotiate the list of search terms and custodians  
16 in good faith, taking into account the hit counts for the search terms and custodians and the subject matter  
17 of the RFP.

18 4. Nothing in this protocol shall be interpreted to require disclosure of irrelevant information  
19 or relevant information protected by the attorney-client privilege, work-product doctrine, or any other  
20 applicable privilege or immunity. The Parties do not waive any objections as to the production,  
21 discoverability, admissibility, or confidentiality of emails and their attachments, and reserve all rights to  
22 seek appropriate relief from the Court.

23 Dated: April 27, 2018

DURIE TANGRI LLP

25 By: \_\_\_\_\_ */s/ Lauren E. Kapsky*  
26 LAUREN E. KAPSKY

27 Attorney for Plaintiff  
28 COLLATERAL ANALYTICS, LLC

1 Dated: April 27, 2018

MCKOOL SMITH, P.C.

2 By: /s/ Ashley Moore  
3 ASHLEY MOORE

4 Attorney for Defendants NATIONSTAR  
5 MORTGAGE, LLC, XOME SETTLEMENT  
6 SERVICES LLC, AND QUANTARIUM, LLC

7 **FILER'S ATTESTATION**

8 Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Lauren E. Kapsky, attest that concurrence  
9 in the filing of this document has been obtained.

10 Dated: April 27, 2018

11 /s/ Lauren E. Kapsky  
12 LAUREN E. KAPSKY

13 **[PROPOSED] ORDER**

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 Dated: 4/30/18

16   
17 RICHARD SEEBORG  
18 UNITED STATES DISTRICT JUDGE

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